

(c:) Defendants Harrison County Jail et al. take away use of telephone visitation and Conteen, use of kiosk. And the plaintiff VARTURSE/C. Penns has been subsequent to the engaging of officers who handcuffed and beat plaintiff VARTURSE C Penns while in medical on 6/10/2021, the plaintiff was accused of spitting on the officer and placed on Red on Red status which is an inmate and officer altercation which deprives the plaintiff of being able to become an inmate worker via trusty and also was sanctioned to months in solitary confinement until an investigation was complete. After finding that MR. Penns the plaintiffs DNA was nowhere to be found and camera or video footage would prove accusations with MR. Penns were false the defendants Harrison County Jail's Administration decided to keep plaintiff VARTURSE Cornelious Penns in locked down on Red on Red status and refuse to remove such custody level even with the proof of wrong doings and misconduct by staff at the Harrison County Jail. The County Jail did demote and or remove status of both officers from Emergency Response Team Members to regular correctional officer before a one James Sones former officer involved resigned, Also A Kimberly Hodges still is employed at Harrison County Jail 10151 LARKIN SMITH DRIVE Gulfport MS 39502. Complaints as well as request have been submitted to defendants Captain ~~LELIE~~, WARDEN Hubbard, Also the Sheriff Troy Peterson which was denied and said defendants have hindered plaintiffs ability to make positive changes and enjoy normal inmate life while housed at Harrison County Jail because of these wrongful allegations of inmate and officer altercation which at no time did plaintiff put hands on any officer nor did the plaintiff spit on 6/10/2021.

(1) Jurisdiction of this proceeding is invoked under the provision of Title 28, section 1343 of the UNITED STATES Code. These proceedings are instituted for violation of rights granted to the citizens of the united states under Title 42 Section 1983 of the UNITED STATES Code, together with these Constitutional rights granted under the SIXth Amendment and Fourteenth Amendment of the Constitution of the United States as well as similar provisions of the MISSISSIPPI Constitution. Upon information and belief Harrison County Jail intends to use cruel and unusual punishment and state on record that Plaintiff VARTAURSE KARNELIOUS PENNS 40460 ASSAULTED ANY OFFICER during the Altercation on June 10, 2021 while in medical which is the reason for such punishment. The officers are using forms of retaliation to continue to keep defendant housed in lock down cell with no access to the outside world, television, radio, or visitation allowed when even in the penitentiary prisoners are allowed to use the phone and watch television, yard call at least for an hour even on lock down but not experience the loss of ALL PRIVILEGES before an thorough investigation is complete and then sanctions are given. The Plaintiff MR VARTAURSE KARNELIOUS PENNS Ability to handle court matters and to communicate properly with attorneys and function appropriately is being stripped away. Plaintiff's ability to defend his life against these wrongful allegations of the officers reasons for beating him and placing him on Red on Red status and refusing to clear Plaintiff's name depend completely on the rights and protection afforded him under the Constitution of the United States and the Constitution of MISSISSIPPI.

(E:) Local publicity has placed an extremely difficult burden upon plaintiff in these proceedings and in procuring the cooperation of witnesses who can and should testify in support of plaintiff's innocence via Harrison County Video Footage and Norsetelicia Lynd, ALS HT, SAhuque of the Harrison County Jail, Notwith Standing Due to the fact that Harrison County Jail and Correctional officers within the Division of Corrections have Assaulted MR. VARTHURSE Carnellus Penns (Plaintiff) placed him on Administrative Lock down and Restricted All privileges because of False Accusations the plaintiff has been charged for Medical exams that did not take place such as X-Rays and CTS (KAT SCANS) After the incident Defendants Harrison County Jail are the only individuals who possess video footage and the Authority to truly Authorize MR. Penns to be place back into Normal Black and whites or B. Custody level after the 6/10/21 incident the plaintiff has suffered tremendously by court appearances brandishing An All Red jumpsuit which appeared very distasteful to the Honorable in Circuit court during pleadings. Plaintiff has not been able to reach an appropriate ear at Harrison County Jail to put an end to the status of humiliaty the Damage done to Plaintiff by this will full deprivation of his constitutional and civil rights is irreparable. Further violations can only be prevented by an immediate entry of an appropriate Order of this Honorable Court restraining and prohibiting Defendants Harrison County Jail ET AL. from continuing the course of conduct calculated to injure plaintiff's fight for Justice and freedom and exoneration, that PLAINTIFF has no other Adequate remedy at Law, therefore, PLAINTIFF prays that this honorable Court gives Judgement: Restraining And Enjoining Kimberly Hodges, James Jones, ERICA Jimenez, Harrison County JAIL et al from counseling, advising, ordering, instructing, threatening or intimidating of any acts which

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Have or tend to have any of the above stated results take place.

(F!) Also Directing HARRISON County Jail et al to appear at a time and place fixed by this Honorable US DISTRICT Court for SOUTHERN DISTRICT SOUTHERN DIVISION SUITE 403, AND answer all relevant questions put to him/her by this PLAINTIFF VARTHAUSE CPENNS 440460 in his defense in connection with the 1983 civil rights complaint and findings on AG Sault and use of unnecessary force and restrictions and cruel and unusual punishment applied by the Harrison County Jail et al and the opinion or opinions he/she has formed relations in the findings, Also and to produce at this appearance any and all relevant material products of the Incident on 6/10/2021, as well as the Video and Audio which they have been held with together any and all relevant material papers, reports, documents, records and correspondence to remove the Red on Red status and place plaintiff back to Normal black and whites or B custody and discontinue to punish inmates at the Jail by losses of all privileges and placing them in Lock down without use of phone, television or microwave, Canteen or visitation, without properly investigating the matter or violating constitutional rights as well as the civil rights and the Constitution of Mississippi. Upon final hearing, make this injunction Permanent; that the Defendants HARRISON County Jail Follow All Rights and Rules of Prisoners Policies and refrain from taking All privileges at once during disciplinary sections and lock down offenders be Allowed to use phone further once granted such other and further relief as it may deem proper. Respectfully Submitted: VARTHAUSE carnelous Penns 440460

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THIS is to certify that I have, as of this
Date 24/March/22 personally served opposing counsel
Harrison County Jail et al in the foregoing matter with
a copy of the above-mentioned documents by depositing
said copy in the United States Mail in a properly addressed
envelope with adequate postage attached.
So ~~CERTIFIED~~ on this 24 March 2022.

VARTHAUSE Cornelious PENNS #440460
Pro SE Litigant
10451 LARKINSMITH DRIVE
GULFPORT MS, 39502 #440460
V. Penn

24/March/2022
Date:

10/October/2025
Expiration Date:

[Signature]
Notary Public

